

2004

**Clark County CDBG Program
and
Clark County/Vancouver HOME
Consortium**

ACTION PLAN

May 2004



proud past, promising future

CLARK COUNTY
WASHINGTON

CLARK COUNTY CDBG PROGRAM & CLARK COUNTY/CITY OF VANCOUVER HOME CONSORTIUM 2004 ACTION PLAN

The Clark County Consortium 2004 Action Plan is a detailed list and description of the activities which will be conducted with federal CDBG funds in Clark County (outside of the City of Vancouver) and with federal HOME funds in Clark County at large. These funds will be utilized to implement the objectives of the Five-Year Strategic Plan presented in Chapter Four of the 2000 – 2004 Clark County/Vancouver Housing and Community Development Plan. The Clark Housing Review Board and the Urban County Policy Board developed the Action Plan through an open process that included the participation of service providers, public agencies and organizations, and from county citizens.

GEOGRAPHIC DISTRIBUTION

The housing and community development needs of the county are dispersed throughout the Clark County area. Many of the projects discussed below are not geographic-specific but are intended to benefit citizens throughout the county. Other projects may be site-specific and intended to serve a specific population. When available, this information is included with the project description. Projects receiving CDBG funds through the County will target the entire county (except for the City of Vancouver). Projects receiving HOME funds will be targeted countywide, except that new construction with HOME funds must be within an urban growth boundary.

SERVICE DELIVERY AND MANAGEMENT

The Consortium's institutional structure for implementation of the H&CD Strategic and 2004 Action Plan is robust. A variety of agencies and organizations play key roles in delivering and managing housing and community development programs throughout the county. Every city within the county participates and has an equal vote on the Urban County Policy Board, which oversees the Community Development Block Grant (CDBG) funding. Examples of projects funded by the Urban County Policy Board include sewer & water system improvements, street & sidewalk improvements, park purchases and the development of community centers. The Clark Housing Review Board (CHRB) reviews and recommends projects for HOME funding. Over the years, the CHRB has used its resources to increase the capacity of local housing providers, to support the development of housing for people with a variety of special needs, and to provide low-income housing rehabilitation throughout the county.

In March 2003, the CHRB was also given responsibility for oversight of Clark County funds associated with SB 2060. During the 2002 Washington State Legislative Session, SB 2060 was created adding an additional \$10.00 fee to document recording charges. The revenue created by this bill is dedicated for use in support of affordable housing. Clark County's total is estimated to be \$750,000 annually. In the spring of 2003, Clark County staff worked with over 50 community stakeholders to develop the following recommendations for the use of the local funding:

- Capital funds for transitional and permanent housing (30%)
- Operating funds for shelters, transitional and permanent housing (40%)
- Funding for the creation of a local housing bond (\$250,000 annually).

The County Commissioners approved of the plan and goals, and designated the Clark Housing Review Board (CHRB) to serve as the oversight body for this funding. In response to the approved plan, staff worked with stakeholders to implement the goals. As of January 1, 2004, there was approximately \$1.2 million in the fund.

Presently, the fund is dedicated for the following uses:

- Capital funds for transitional and permanent housing – There was approximately \$500,000 allocated to be used in conjunction with the HOME funding. The CHRB recommended that the funding be used to augment the available HOME money for the three housing construction projects awarded in 2004.
- Operating funds for shelters, transitional and permanent housing – There was approximately \$645,000 allocated for use for operating funds for shelters and operating support for transitional and permanent housing projects. The CHRB recommended that the funding be used to support seven separate programs at five different agencies. The agencies are Share, Janus Youth, YW Housing, YWCA, Columbia River Mental Health.
- Funding for the creation of a local housing bond (\$250,000 annually) - County staff negotiated a two-million dollar bond purchase that is to be used to purchase property that is to be developed for low-income housing. The two-million dollars is expected to support three property purchases. As of March, 2004, there has been one piece of property purchased in Battle Ground and a piece in Camas that is under negotiation.

2004 ACTION PLAN

Affordable Housing

Objective #1: Increase the supply of housing affordable to renter households earning 50 percent or less of the area median family income.

General Actions:

1. **Increase Public Housing Units/Section 8 Voucher Programs.** Seek additional federal funds and a variety of other funding/revenue sources to increase the housing stock for low-rent public housing units and Section 8 certificate and voucher programs. The lead agency should be the Vancouver Housing Authority.
2. **Support Creation of Rental Housing.** Support applications from private and non-profit housing developers who propose to create rental housing using Washington State Housing programs.
3. **Support Continuum of Care Efforts.** With the goal of increasing the number of low-income rental units available, Clark County will work with members of the Continuum of Care Planning group to develop a network of landlords who are willing to accept high- risk residents.

HOME/CDBG Funding Actions:

1. **Affordable Community Environments (ACE) - CHDO Operations.** Operating funds for ACE, a Community Housing Development Organization. Total HOME Budget: \$21,000 from 2004 Entitlement.
2. **Affordable Community Environments (ACE) - The Mews at Cascadia Village.** Clark County Home Consortium will provide assistance for the construction of The Mews at Cascadia Village. The Mews will consist of 24 rental apartment units, affordable to people 60 percent of median or less. The housing will be located at 7200 NE 94th Avenue, Vancouver. Total HOME Budget: \$470,254 (\$449,254 from 2004 Entitlement and \$21,000 from Anticipated Program Income).
3. **YW Housing - Aurora Place Apartments.** HOME funds would be used to assist in the construction of 25 apartment units for people who are at 50 percent or below of median income. The project will be located at the intersection of 36th and Main Street in Vancouver. Total HOME Budget: \$100,000 from 2004 Entitlement.

Objective #2: Promote homeownership for low- and moderate-income households earning less than 80 percent of the area median family income through an integrated approach that involves increasing housing supply, increasing financial options for both housing providers and purchasers, increasing individual capacity to

purchase, and allowing for increased density.

HOME/CDBG Funding Actions:

1. **Evergreen Habitat for Humanity – Patten Park (Eight Habitat for Humanity Homes).** Funds for financial assistance for the construction of the infrastructure for eight owner-occupied homes for households whose incomes range from 25 to 60 percent of the area median income. The houses will be built on a 1.63 acre parcel of land located at 7017 NE 98th Avenue, Vancouver. Total HOME Budget: \$426,000 from 2004 Entitlement.
2. **Columbia Non-Profit Housing - First Home Loan Program.** Funds for financial assistance to approximately 16 first time homebuyers, whose income is at or below 80 percent of median income. Project will include pre- and post-purchase counseling and homebuyer seminars through the Community Housing Resource Center. Total HOME Budget: \$419,496 (\$150,000 from 2004 Entitlement, \$90,000 from HOME Program Income, and \$179,496 from the American Dream Downpayment Initiative). Total CDBG Budget: \$90,000 from Program Income.
3. **Columbia Non- Profit Housing (CNPH) – CHDO Operations.** Operating funds for CNPH, a Community Housing Development Organization. Total HOME Budget \$28,466 from 2004 Entitlement.

Objective #3: Create additional housing options and increased opportunities for self-sufficiency for low-income elderly persons, persons with disabilities or special needs, and public housing residents.

General Actions:

1. **Sell County Owned Property for Creation of Special Needs Housing.** Clark County will explore options to sell county-owned property to private non-profit organizations to be used for rental units for persons with special needs. The County will also provide technical assistance to non-profit organizations in writing funding applications and making the transition to owning and managing housing.
2. **Assist Non-Profit Housing Agencies with Capacity Building.** Clark County Department of Community Services will assist the building of the capacity of local non-profits to enable them to develop, own, and manage housing units for affordable and supported housing.
3. **Advocate for Increased State Funding For Special Needs Housing.** Clark County, and the Vancouver Housing Authority will advocate for increased state and federal funding for rental housing for persons with special needs, including persons with developmental disabilities, mental illness, physical disabilities, AIDS, and the elderly.
4. **Assist with the Development of Housing for People with HIV & AIDS.** Clark County Department of Community Services will work with the Southwest Washington consortium on HIV & AIDS to develop low-cost housing.

5. **Assist Agencies Working on Disabled/Special Needs Housing.** Clark County will work with the Council for the Homeless and service agencies to develop an application to HUD for permanent supported housing for people who are disabled with one or more of the following: substance abuse, mental illness, and/or HIV/AIDS.

HOME/CDBG Funding Actions:

1. **Inland Empire Residential Resources (IERR) – Men’s Recovery House.** Funds will be used to purchase a home to be used as transitional housing for up to seven men in recovery from drug and alcohol abuse who are waiting for in-patient treatment openings. Total CDBG Budget: \$176,937 (\$126,000 from 2004 Entitlement and \$50,937 in reprogrammed funds).
2. **YW Housing – CHDO Operations.** Operating funds for YW Housing, a Community Housing Development Organization. Total HOME Budget \$28,466 from 2004 Entitlement.

<p>Objective #4: Preserve, whenever cost-effective, existing affordable housing units threatened with loss due to condition, location, or other situations.</p>
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General Actions:

1. **Fund and Administer the Clark County Homeowner Rehabilitation Loan Program.** Clark County/City of Vancouver HOME Consortium will continue to fund and administer the Clark County Homeowner Rehabilitation Loan Program. This program provides low-interest deferred payment loans to homeowners to rehabilitate or make small repairs to single-family, owner-occupied homes throughout Clark County. Approximately six low- and moderate-income homeowners are expected to be served in 2004 throughout Clark County. Total CDBG Budget: \$150,000 (\$130,000 from 2004 Entitlement and \$20,000 in Anticipated Program Income).
2. **Continue Marketing the Clark County Homeowner Rehabilitation Loan Program.** Clark County will continue to develop marketing strategies for the Clark County Homeowner Rehabilitation Loan Program, especially in areas targeted in the H&CD Plan as having a high percentage of at-risk housing units.
3. **Administer Clark County Weatherization Program.** Clark County will continue to administer the Clark County Weatherization Program for rental and homeowner units. Approximately 225 low-income households are expected to be served throughout Clark County if funding remains at current levels. Funds from the U.S. Department of Energy will be used.
4. **Facilitate Relocation of County Owned Housing Threatened by Loss.** Clark County will identify county-owned housing units, which may be threatened due to traffic or road improvements or other activities and explore purchase options with non-profit organizations to buy and move the homes, whenever feasible and cost-effective. The Washington State HTF resources are potential sources of funding for moving or purchasing county-owned property.

Homelessness

Objective #1: Provide and enhance services and facilities to serve the needs of homeless individuals and families including teenagers with an emphasis on implementing a continuum of care approach. This approach includes assessment and outreach, emergency shelter, transitional housing, permanent housing, and services to encourage self-sufficiency.

General Actions:

County Staff will continue to work closely on the Continuum of Care planning group, including assisting in grant applications, program design, funding allocation and monitoring services.

HOME/CDBG Funding Actions:

1. **Share – Wise Moves Transitional Housing.** Funds will be used to support the staffing of a tenant based housing counselor and case manager for Share’s Wise Moves transitional housing program. The goal of the program is to transition families from shelters into permanent housing through the use of rental subsidies and on-going case management. Total CDBG Budget: \$32,300 from 2004 Entitlement.
2. **Share – Story Street Subsidized Housing Project.** HOME funds will be used to provide tenant rental assistance for approximately 20 people who are at 50 percent or below of area median income. The tenants will receive case management services and can stay in the program for up to 24 months. Total HOME Budget: \$150,000 from 2004 Entitlement.

Objective #2: Secure stable sources of operating funding for existing services and facilities.

General Actions:

1. **Explore Sources of Funds for Shelter Operating Expenses and Homelessness.** Clark County Department of Community Services and the Council for the Homeless will explore sources of operating funds used by other shelters in Washington State to identify additional sources for Clark County.
2. **Coordinate County Efforts to Apply for Homeless Funds.** Clark County will apply for Homelessness funds through the State of Washington. The County will assume a coordinating role for submitting the application, and provide technical assistance to non-profits in preparing the applications.

Objective #3: Provide services to prevent persons at risk from becoming homeless.

General Actions:

1. **Administer Funds for Low-Income Home Energy Assistance.** Clark County will continue to administer and seek funds for the Low-Income Home Energy Assistance Program (LIHEAP), which provides emergency funds for low-income persons who have difficulty paying utility bills. Approximately 2,920 low-income households are expected to receive assistance in 2004. Funds from Washington State Department of Energy will be used.
2. **Stabilize Funding for Programs Targeted at Persons at Risk of Becoming Homeless.** Clark County will explore ways to stabilize funding for emergency clothing, food, and financial assistance for low-income persons at risk of becoming homeless. Funds from the Emergency Shelter Block Grant program, the Federal Emergency Management Agency, and local, private sources will be sought.
3. **One-time Emergency Assistance to Persons Threatened with Eviction.** The Salvation Army, St. Vincent de Paul, SHARE, Inc., Woodland Community Center and Interfaith Treasure House will continue to provide one-time emergency assistance grants to persons threatened with homelessness due to eviction. During 2003, these agencies provided support to 365 households. The goal for 2004 is to maintain or exceed this number of households. Funds from the Federal Emergency Management Agency and local, private sources will be sought.

<p>Objective #4: Improve coordination between service providers to improve service delivery and to address gaps in the continuum of care.</p>
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General Actions:

1. **Participate in the Coalition of Service Providers.** The Coalition of Service Providers meets monthly to share information, discuss operating procedures, case management services, identify resources, and discuss methods to improve service delivery.
2. **Participate in the Continuum of Care.** The Continuum of Care planning group is composed of over 30 provider agencies, government representatives, formerly homeless people and other interested parties. The group meets monthly to share information, discuss agency policies, identify funding opportunities and review government policies that have implications for the homeless.
3. **Participate in Washington State Coalition for the Homeless.** The Council for the Homeless and Clark County Department of Community Services will continue to participate in advocacy and planning activities of the Washington State Coalition for the Homeless.

COMMUNITY DEVELOPMENT

Objective #1: Create suitable living environment by improving the safety and livability of neighborhoods and communities throughout the county.

HOME/CDBG Funding Actions:

1. **Battle Ground - SW 20th Avenue Pedestrian Improvements.** The construction of new curb/gutter, sidewalks, street lights and storm water facilities:
 - On SW 20th Avenue - beginning approximately 200 feet south of its intersection with Main Street and extending south approximately 1,100 feet, and
 - On 2nd Street - Approximately 300 feet of street improvements shall be completed on SW 2nd Street beginning at its intersection with SW 20th Avenue.The CDBG Budget for this project is \$150,000 from 2004 Entitlement.
2. **Woodland - Drinking Water Reservoir Cover Replacement.** Upgrade reservoir's current leaking cover with new domed cover to prevent contamination of Woodland's drinking water and bring the city's water system into compliance with current regulations. The reservoir is located at 130 Scott Hill Road, Woodland; it serves the entire community. Total CDBG Budget: \$100,000 (\$43,371 from 2004 Entitlement and \$56,629 in Program Income).
3. **Camas - NW Couch/16th Avenue Neighborhood Improvements.** The construction of streets, sidewalks, storm drainage, and water line improvements on NW Couch Street between NW 12th and NW 16th Streets and on NW 16th Street between Drake and Benton Streets. Clark County intends to authorize pre-award costs for this project, which will have no effect on the town's eligibility for future grants. Total CDBG Budget: \$248,500 from 2004 Entitlement.
4. **Yacolt - N. Blackmore Avenue Reconstruction.** This Project shall consist of street improvements to Yacolt's Blackmore Avenue between West Yacolt Road and West Jones Street. The roadway will be widened from its current width of 16' to 28'. The project will also include the construction of curbs, gutters, and storm drainage. This project shall be constructed in conjunction with the Blackmore Avenue Sidewalk Project that was funded with CDBG funds in 2003. Clark County intends to authorize pre-award costs for this project, which will have no effect on the town's eligibility for future grants. Total CDBG Budget: \$167,300 (\$151,329 from 2004 Entitlement and \$15,971 in reprogrammed funds).
5. **Washougal - Downtown Sidewalk Improvements.** Construct ADA ramps and sidewalks (in places where there are none) in the area of downtown Washougal bounded to the east by 15th Street, to the south by Front Street, to the west by 24th Street, and to the north by "D" Street. Total CDBG Budget: \$141,600 in reprogrammed funds.

Objective #2: Demonstrate a commitment to long-term economic growth by promoting a diverse economic base and family wage jobs, and by providing opportunity for all citizens especially the unemployed and disadvantaged persons.

General Actions:

1. Clark County will support the WorkSource West Vancouver's job training and placement programs for low-income persons, displaced workers, and older-than-average workers.

Objective #3: Develop a Neighborhood Revitalization Strategy in one or, more qualifying areas to arrest the continuing decline of older neighborhoods and their livability.

General Actions:

1. Clark County will explore the creation of a Neighborhood Revitalization Strategy for one or more qualifying areas in the County.

Objective #4: Support public facility improvements for non-profit agencies with a priority on agencies that provide services to low- and moderate-income persons.

HOME/CDBG Funding Actions:

1. **Battle Ground – Senior Center Improvements.** This project shall result in a number of improvements at the Battle Ground Senior Center, including upgrades to the facility's ceiling, kitchen and restrooms. The Senior Center is located at 116 NE 3rd Avenue, Battle Ground. Total CDBG Budget: \$63,000 from 2004 Entitlement.
2. **Washougal – Social Services Building Improvements.** This project shall result in a number of improvements at the Washougal Social Services Building. Specific improvements include the installation of an elevator to allow for the expansion of social service programs/offerings into the basement and second floor space. The project will also result in the full paving of the center's parking lot which will provide for off-street parking for facility users. The facility is located at 1702 "C" Street, Washougal. Total CDBG Budget: \$257,300 from 2004 Entitlement.
3. **Columbia River Mental Health – Facility Expansion Plan.** Complete a plan to examine the feasibility for developing office space on the second floor of Columbia River Mental Health facility located at 6926 E 4th Plain, Vancouver. Total CDBG Budget: \$20,000 from 2004 Entitlement.

4. RESOURCES EXPECTED TO BE AVAILABLE

The table below lists the resources expected to be available in Clark County to address the priority needs and specific objectives identified in the Action Plan.

Funding Source	Anticipated to be Available
HOME	\$1,556,317
CDBG	\$1,576,000
ADDI	\$188,126
Program Income (CDBG & HOME)	\$277,629
McKinney Homeless Assistance (COC 2004)	\$800,000
HOPWA ¹	\$100,000
LIHTC	\$3,602,099
Section 8 - Subsidy	\$12,217,950
Low Rent Housing Subsidy	\$830,000
Low Rent Housing Capital Funding	\$916,980
Drug Elimination	\$0
Ross Grant	\$30,000
THOR	\$42,000
USDA Rural Utilities Service (FmHA)	\$2,000,000
Weatherization	\$1,018,319
LIHEAP	\$1,543,576
ESAP	\$491,472
CSBG	\$647,409
EFSP	\$317,307
ESG	\$89,100
Section 811 - operating subsidy	\$22,130
Section 811 - capital	\$0
Section 202 Elderly (operating subsidy)	\$972,610
HB 2060 Recording Surcharge	\$1,400,000
Total	\$30,639,020

¹ HOPWA funds are administered by the City of Portland on behalf of the six-county Portland EMA.

The table below lists the non-federal resources proposed as match for 2004 Clark County HOME Projects.

Funding Source	Anticipated to be Available
State Total	\$2,407,717
Private Total	\$2,395,437
GRANT TOTAL	\$4,804,154

Program income is any income generated from the use of CDBG and HOME funds, such as proceeds loan repayments. Program income accrued must be used prior to drawing additional program funds from the federal line of credit. Program income for active contracts must be accounted for on each reimbursement request. HOME funds received from a project before the affordability period has expired are recaptured funds and not HOME program income.

LEVERAGING OTHER FUNDS

Clark County will take actions to assist other agencies and organizations in applying for all available funds and leveraging other resources to implement the housing strategies and programs. Clark County will also establish a network of representatives from the private lending community, financial experts, and private and non-profit housing developers and consultants who can provide technical expertise in packaging development proposals. Clark County will also submit letters of support and verification of consistency for project applications which support the goals and objectives found in the H&CD Plan. The limited Clark County CDBG and HOME funds in may cases provide gap financing for projects receiving county HOME funds through the State of Washington, Low Income Housing Tax Credits, bonds and for the homebuyer program private mortgage funds. Because there are not enough HOME funds to completed projects by themselves, project sponsors must leverage other funds sources in amounts greater then the HOME funds available.

The CDBG and HOME applications strongly encourage the leveraging of other funds. CDBG applicants can receive up to 10 additional points, when the project applications are scored, for committing a higher level of match for their project.

The HOME program encourages leveraging additional funds by awarding up to 5 additional rating points for HOME eligible match exceeding the 25 percent minimum HOME match requirement. All the HOME projects include Washington State Housing Trust Funds which meet the HOME match requirement. In addition, a few projects have various fees waived and provide services to tenants that also meet the HOME match requirements. The match for the 2004 HOME projects, requiring a match, will exceed the minimum 25 percent non-federal HOME match requirement. Specific projects generating match include Ace's "The Mews," approximately \$929,750 match, Habitat for Humanity's "Patten Park," approximately \$986,500 match, YW Housing's "Aurora Place," approximately \$974,975 match, Columbia Non-Profit Housing's "First Home Loan Program," approximately \$900,000 match, and Share's "Story Street Program," approximately \$5,000 in match.

INSTITUTIONAL STRUCTURE

In 2004, Clark County will research options for improving its housing and community development institutional structures. The Clark County Housing and Community Development unit of the Department of Community Services is responsible for housing & community development policy analysis, implementation of programs identified in the H&CD Plan, advocacy for affordable housing, monitoring progress towards objectives, creation of non-profit developers, allocation of state and county resources, and technical support.

PUBLIC HOUSING IMPROVEMENTS

The actions and steps to be taken by the Vancouver Housing Authority in 2004 to improve the management and operations of public housing units and to enhance the living environments of public housing tenants are described in the Five Year Action Plan of the Comprehensive Grant Program. Actions and steps to encourage resident involvement are also described in the Five Year Action Plan.

A report of the Vancouver Housing Authority's activities and expenditures to improve the living environments of public housing residents can be found in the Vancouver Housing Authority's Annual Statement of the Comprehensive Grant Program.

ANTI-POVERTY STRATEGY

Poverty is a complex problem that must be addressed at the local, state, and federal level. Strategies to alleviate poverty need to focus on a range of services to reflect a continuum of needs and progress towards self-sufficiency. Homeless people need basic services such as shelter, food, clothing, and health care. Persons at risk of being homeless need transportation, emergency assistance, childcare, case management, education, and job and household skills training. Finally, as individuals and families become more stabilized, they need job training and job opportunities which provide livable wages.

Clark County Department of Community Services can impact only some of the causes of poverty. The County can do this by encouraging employers that pay livable wages, ensuring that the area has housing and human service providers able to offer the continuum of services necessary for self-sufficiency, and develop or continue programs aimed at reducing the number of households in poverty.

Clark County's anti-poverty strategies focus on the goal of increasing self-sufficiency of low-income individuals and families. In achieving this goal, the County will participate in the following programs:

- Continue to provide or act as a broker for the delivery of basic services through the Clark County Department of Community Services for emergency shelter, transitional case management, food, and low-income energy assistance and weatherization programs.
- Support the programs of the Council for the Homeless and providers in emergency and transitional shelter and services to persons who are homeless or at risk of being homeless.

- Support the Vancouver Housing Authority's Self Sufficiency Program in increasing participants' household and financial management skills to enable them to become more self sufficient and reduce their need for public assistance.
- Support the activities of the SW WA Workforce Development Council to provide job training and self-sufficiency skills to extremely low- and low-income persons.
- Continue to provide funding for services and activities through the Clark County/City of Vancouver Coordinated Human Services Fund (HSF), Federal Community Services Block Grant (CSBG), EFSP, ESAP, Marriage License Fee Surcharge.

LEAD-BASED PAINT HAZARD REDUCTION EFFORTS

To evaluate and reduce lead-based paint hazards during the program year, Clark County will:

- Coordinate with public and private efforts to reduce lead-based paint hazards in residential units.
- Participate in a Portland-Vancouver Regional lead-based inter-agency efforts to obtain additional funds for testing, and reduction of lead-based paint.
- Integrate lead hazard evaluation and reduction activities into existing housing programs.
- Support and promote comprehensive public health programs aimed at education and testing.
- Clark County has identified several companies in Washington and Oregon, which can evaluate and reduce lead-based paint. The Clark County rehabilitation staff is trained in Safe Work Practices and Risk Assessment.

COORDINATION OF SERVICES

Clark County will enhance coordination of public, private, and non-profit housing providers, human service agencies, and social service providers through the following actions:

- Continue to work with other jurisdictions including the Vancouver Housing Authority within the County to prioritize housing needs, provide services, and maximize the use of federal, state, and local funds for affordable housing, community development, and related services throughout the county.
- Continue to participate in coordination efforts initiated by the Council for the Homeless for shelter and services for homeless individuals and families.
- Facilitate a working group of public and non-profit housing developers and providers. Its purpose will be to provide progress reports on current projects, share information about funding sources, collaborate on projects, and problem-solve.

- Continue to work with the Vancouver Housing Authority and public housing residents to identify gaps in housing for low-income renters and special needs populations and to develop housing programs to meet these needs.

MONITORING PLAN

Clark County has extensive monitoring procedures with regard to funds provided by HUD. These procedures were developed to address Federal, State and County statutory and regulatory requirements in addition to providing County staff with a system of ensuring project compliance and accomplishment. Along with other funds received from HUD, Clark County will conduct monitoring reviews to determine that the County's programs financed by CDBG, HOME, and ESG funds will be carried out in accordance with the County's adopted H&CD Plan and in a timely manner (HOPWA funds are monitored by the City of Portland). This section will discuss (1) monitoring to meet H&CD Plan goals, (2) ensuring compliance with statutory and regulatory requirements, and (3) maintaining fiscal control.

MONITORING TO MEET H&CD PLAN GOALS

Clark County will report annually on the progress made toward meeting the goals established in the H&CD Plan for assisting persons and communities at or below 80 percent of the median income. This performance report will comply with HUD's requirements and format and be submitted by the date HUD selects.

COMPLIANCE WITH STATUTORY AND REGULATORY REQUIREMENTS

Clark County has three major monitoring tools to ensure compliance with requirements. These are (a) policies, (b) contract requirements and (c) on-site monitoring.

POLICIES

The Clark County H&CD Plan will be used to guide the CDBG and HOME allocation processes.

Agencies requesting funds are asked to respond to general and program-specific policies in their application. The general policies incorporate federal, state and local requirements. These policies include, among others:

- consistency with local codes and policies
- restrictions on change of use of property/buildings assisted with federal funds
- establishment of a legally binding public interest
- minimization of displacement and provision of relocation assistance
- adherence to federal wage rates
- compliance with federal audit requirements
- adherence to lead-based paint abatement regulations
- establishment of affordable rents
- minority and women-owned business participation

- affirmative marketing

All projects requesting CDBG and HOME funds are evaluated to determine if they are (1) program eligible and priority based on program policies, (2) consistent with local, state and federal regulations, and (3) viable as submitted.

CONTRACTS WITH SUBRECIPIENTS

Agencies or cities that have projects funded through HOME or CDBG will be required to enter into a contract with Clark County. In addition to the scope of work, duration and projected accomplishments or performance, each contract contains federal, state and local program requirements by which each agency must abide. These include, but are not limited to:

- audits
- subcontracting
- insurance coverage
- conflict of interest issues
- grounds for suspension or termination
- corrective action
- prohibition of political activities
- non-substitution of local funds
- constitutional prohibition against funding of religious activities
- environmental review
- non-discrimination practices
- procurement standards
- labor standards
- restrictions on change of use
- acquisition and relocation
- housing quality standards
- income and rent requirements for HOME projects
- lease requirements for HOME projects
- public information
- certification regarding lobbying
- evaluation and record keeping
- acquisition procedures
- relocation and one-for-one replacement housing
- Section 504/handicapped accessibility
- construction
- lead-based paint hazard reduction
- minority and women-owned business participation
- affirmative marketing

Agencies are encouraged to clearly understand that the contract requirements are the criteria against which they will be monitored. When the contract agreement has been signed by the sub-grantee and Clark County, a meeting is held between the project manager and the sub-grantee to ensure that the sub-grantee is aware of all conditions that accompany the agreement. The more complicated requirements such as Davis-Bacon wage rates, lead-based paint abatement, Section 504 Accessibility, bidding requirements and procurement procedures are given special attention. The project manager keeps in touch with the sub-grantee on the progress of the project and is available throughout the life of the contract for continuing technical assistance.

Construction projects that require compliance with federal wage standards have an additional layer of review, which includes a pre-construction conference with the project manager, sub-grantee and the projects' architect or engineer. The meeting is to assure that the bid specifications will include reference to federal wage rates.

The procedure outlined above is characteristic of Clark County HOME and CDBG funds administered by the County.

ON-SITE MONITORING

During the middle of the project year, the County schedules monitoring visits with selected sub-grantees. During the site visit, the project manager reviews records and evidence of performance in many areas: program administration, benefit to persons at or below 80 percent of the median income, equal opportunity in employment, real property acquisition and relocation, procurement procedures, construction projects, finance and record-keeping and audit requirements, among other areas. The checklist of areas to be monitored is reviewed and updated annually and has been reviewed by the local HUD office. This progress helps the project managers identify areas that need attention when dealing with a particular project and sub-grantee. The project manager will work with a sub-grantee until the deficiency identified in the monitoring report is rectified.

For projects with a restriction on change of use, periodic visits are conducted during the years the restriction is in place. As part of the annual reporting of the program accomplishments, CAPERs, data is collected from recipients for reporting Section 3, affirmative marketing, HOME match, and minority and women-owned business participation.

All projects requiring deeds or covenants are tracked by Clark County Department of Community Services. DCS's tracking system provides current financial information and beneficiary data. The system also schedules HOME on-site monitoring and tracks rental projects, tenant income, and rental data during the affordability period. The DCS tracking system schedules HQS inspections of rental units at the appropriate interval. All HOME recipients, CDBG limited clientele, and housing recipients are provided annual updates of median area income and rent limits.

FISCAL CONTROLS

The County has standardized procedures to ensure that fiscal information on HOME and CDBG funds that is being submitted to a HUD cash and management information system is correct and complete. Once a letter of credit is approved and HOME and CDBG funds become available, separate accounts are set up through the County Auditor's Office.

Each approved project is linked to each account authorized by the respective letter of credit. A continuing balance for each project is maintained and can be accessed on a weekly basis. A separate account for HOME matching funds has been set up and the HOME staff is responsible for monitoring allocations and expenditures to ensure the matching requirements have been met.

When the sub-grantee requests reimbursement, they are required to submit a County voucher reimbursement and backup documentation that the costs were actually incurred, as well as a performance accomplishment report. Individual project managers and a fiscal staff person review both. Reimbursement requests are reviewed for appropriateness and eligibility under contracted provisions. If an inappropriate or ineligible cost is incurred, or if performance falls far below projections, the County will not reimburse the sub-grantee and will meet with them to try to rectify the situation.

The completion of a project does not necessarily end the County's involvement. For example, once a construction or real property acquisition project is completed, the County will secure the public interest in the project and restrict any potential change of use via a promissory note and deed of trust instrument against the real property. HOME and some CDBG funds are subject to payback, with a share of the appreciated value, if the use of the property changes.

HOME PROGRAM RECAPTURE PROVISIONS

As stipulated in 24 CFR.92.254, housing purchased through the Low Income Home Ownership Assistance Program must be the principal residence of the eligible family through the affordability period described below. The property must be secured by a deed of trust specifying the affordability period.

The affordability period is as follows:

- Assistance under \$15,000 requires a 5-year affordability period;
- Assistance from \$15,000 to \$40,000 requires a 10-year affordability period.

If the housing purchased through the first-time homebuyer program is sold prior to the end of the affordability period the County expects to recapture the initial investment.

If the "net proceeds" (sale price minus non-HOME mortgage repayment and closing costs) are sufficient the full amount of the HOME assistance shall be recaptured.

If the "net proceeds" are not sufficient to recapture the full HOME investment and enable the homeowner to recover the down payment, the "net proceeds" will be divided proportionally as shown below.

$$\text{Recaptured HOME Funds} = \text{Net proceeds} \times \frac{\text{HOME Funds}}{\text{HOME Funds} + \text{Homeowner Funds}}$$

$$\text{Amount to Homeowner} = \text{Net proceeds} \times \frac{\text{Homeowner Funds}}{\text{HOME Funds} + \text{Homeowner Funds}}$$

Recaptured HOME funds will be used for other HOME eligible activities.

AMERICAN DREAM DOWNPAYMENT INITIATIVE (ADDI) NARRATIVE

The American Dream Down payment Act (ADDI) was approved in December 2003. The act established an allocation under the HOME Program to provide for down payment assistance to low-income family who are first-time homebuyers.

The term “first-time homebuyer” means an individual or family who has not owned a home during the three-year period prior to purchase of a home with ADDI assistance. There is an exception for individuals who are considered to be “displaced homemakers” or a “single parent” and owned a home with his or her spouse.

The minimum amount of ADDI funds in combination with HOME funds that must be invested in a project is \$1,000. The amount of ADDI assistance provided to any family may not exceed the greatest of six percent of the purchase price of a single family using unit or \$10,000.

ADDI funds may be used for eligible project costs, including: (1) The costs of acquiring single family housing; (2) the eligible development hard costs for rehabilitation projects described in the statute (a) of the HOME Program regulations; (3) the costs for reduction of lead paint hazards and the remediation of other home health hazards; and (4) specified related “soft costs” (i.e., reasonable and necessary costs incurred by the homebuyer or participating jurisdiction associated with the financing of single family housing).

ADDI provides low-income families homeownership assistance to enable them to achieve the personal and financial benefits of homeownership. The County may invest ADDI funds as interest-bearing loans, non-interest bearing loans or advances, interest subsidies consistent with the purposes of the ADDI, deferred payment loans, grants.

Currently, Columbia Non-Profit Housing (CNPH) is the only provider of first-time home buyers assistance contracted with by the County. CNPH will be contacting Vancouver Housing Authority residents through their monthly newsletter (“Neighbor to Neighbor”) and will also be contacting local manufactured housing parks through their state-wide organization. CNPH will include a description of the program, instructions on how to obtain information, program guidelines, and a schedule of informational meetings.

To assure the success and stability of families receiving ADDI funds, the County’s first-time homebuyers program provides a very well organized system of individual counseling, pre-purchase, post-purchase classes, and credit repair. The program works with the Housing Resource

Center, which conducts a homebuyer education class accredited by the Washington State Housing Finance Commission. The County's first time homebuyers program has been operating since 1996 and has assisted in the funding of over 350 loans with only three loans going into default.

OTHER FORMS OF INVESTMENT

The Consortium does not use forms of investment other than those described in 24 CFR 92.205(b).

2004 ACTION PLAN PUBLIC COMMENTS

The 2004 Action Plan was published on April 10, 2004 in The Columbian and distributed to all public libraries in Clark County. A Public Hearing was held before the Clark County Board of Commissioners on May 11, 2004. No public comments were received.

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing -- The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential antidisplacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

Drug Free Workplace -- It will or will continue to provide a drug-free workplace by:

1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
2. Establishing an ongoing drug-free awareness program to inform employees about -
 - (a) The dangers of drug abuse in the workplace;
 - (b) The grantee's policy of maintaining a drug-free workplace;
 - (c) Any available drug counseling, rehabilitation, and employee assistance programs; and
 - (d) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
3. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 1;
4. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will -
 - (a) Abide by the terms of the statement; and
 - (b) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
5. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is so convicted.
 - (a) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
 - (b) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
7. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1, 2, 3, 4, 5 and 6.

Anti-Lobbying -- To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction -- The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

Signature/ Authorized Official
Bill Barron, County Administrator

Date

SPECIFIC CDBG CERTIFICATIONS

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

Following a Plan -- It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);
2. Overall Benefit. The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) 2003 (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;
3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the

case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

Compliance With Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

Lead-Based Paint -- Its notification, inspection, testing and abatement procedures concerning lead-based paint will comply with the requirements of 24 CFR §570.608;

Compliance with Laws -- It will comply with applicable laws.

Signature/ Authorized Official
Bill Barron
Title: County Administrator

Date

SPECIFIC HOME CERTIFICATIONS

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If the participating jurisdiction intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the participating jurisdiction's consolidated plan for expanding the supply, affordability, and availability of decent, safe, sanitary, and affordable housing.

Eligible Activities and Costs -- it is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in § 92.214.

Appropriate Financial Assistance -- before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

Signature/ Authorized Official

Date

Bill Barron

Title: County Administrator

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING AND DRUG-FREE WORKPLACE REQUIREMENTS:

1. Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

2. Drug-Free Workplace Certification

- (a) By signing and/or submitting this application or grant agreement, the grantee is providing the certification.
- (b) The certification is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, HUD, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.
- (c) Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.
- (d) Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio stations).
- (e) If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph three).

- (f) The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of Performance (Street address, city, county, state, zip code)
1610 C Street
Vancouver, Clark County, Washington 98660

Check if there are workplaces on file that are not identified here.

The certification with regard to the drug-free workplace is required by 24 CFR part 24, subpart F.

3. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

"Controlled substance" means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15);

"Conviction" means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes;

"Criminal drug statute" means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;

"Employee" means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All "direct charge" employees; (ii) all "indirect charge" employees unless their impact or involvement is insignificant to the performance of the grant; and (iii) temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).